



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

AUG 18 2015

**CERTIFIED MAIL 7009 1680 0000 7648 7542**  
**RETURN RECEIPT REQUESTED**

Ms. Tonya Powell  
Safety Team Leader  
Chicago Tribune – Freedom Center  
77 West Chicago Avenue  
Chicago, Illinois 60610

Re: Notice of Violation  
Compliance Evaluation Inspection  
ILD 045 304 367

Dear Ms. Powell:

On July 16, 2014 a representative of the U.S. Environmental Protection Agency inspected the Chicago Tribune – Freedom Center facility (Tribune) located in Chicago, Illinois. As a large quantity generator of hazardous waste, the Tribune is subject to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 *et seq.* (RCRA). The purpose of the inspection was to evaluate the Tribune's compliance with certain provisions of RCRA and its implementing regulations related to the generation, treatment and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based on information provided by the Tribune, EPA's review of records pertaining to the Tribune, and the inspector's observations, EPA has determined that the Tribune has unlawfully stored hazardous waste without a permit or interim status as a result of the Tribune's failure to comply with certain conditions for a permit exemption under Ill. Admin. Code tit. 35 § 722.134(a)-(c) [40 C.F.R. § 262.34(a)-(c)]. EPA has identified the permit exemption conditions with which the Tribune was out of compliance at the time of the inspection in paragraphs 1-2, below.

At the time of the inspection, the Tribune was out of compliance with the following large quantity generator permit exemption condition:

**STORAGE OF HAZARDOUS WASTE WITHOUT A PERMIT OR INTERIM STATUS**

1. Date When Each Period of Accumulation Begins



Under Ill. Admin. Code tit. 35 § 722.134(a)(2) [40 C.F.R. § 262.34(a)(2)], a large quantity generator must clearly mark each container holding hazardous waste with the date upon which each period of accumulation begins.

At the time of the inspection, the Tribune was accumulating one container of hazardous waste without the accumulation start date.

Many of the conditions for a RCRA permit exemption are also independent requirements that apply to permitted and interim status hazardous waste management facilities that treat, store, or dispose of hazardous waste (TSD requirements). When a hazardous waste generator loses its permit exemption due to a failure to comply with an exemption condition incorporated from Ill. Admin. Code tit. 35 Part 725, the generator: (a) becomes an operator of a hazardous waste storage facility; and (b) simultaneously violates the corresponding TSD requirement. The exemption condition identified in paragraph 1 is also an independent TSD requirement incorporated from Ill. Admin. Code tit. 35 Part 725. Accordingly, each failure of the Tribune to comply with this condition is also a violation of the corresponding requirement in Ill. Admin. Code tit. 35 Part 725 [40 C.F.R. Part 265].

#### **STORAGE OF HAZARDOUS WASTE WITHOUT A PERMIT OR INTERIM STATUS AND VIOLATIONS OF TSD REQUIREMENTS**

##### **2. Personnel Training**

A large quantity generator of hazardous waste must have a program of classroom instruction or on-the-job training that teaches facility personnel to perform their duties in a way that ensures the facility's compliance with requirements of RCRA. This program must be directed by a person trained in hazardous waste management procedures, and must include instruction that teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed. *See* Ill. Admin. Code tit. 35 §§ 722.134(a)(4) and 725.116(a) [40 C.F.R. §§ 262.34(a)(4) and 265.16(a)]. Facility personnel must successfully complete this training program within six months after the date of their employment or assignment to a facility or to a new position at a facility, and must take part in an annual review of this initial training thereafter. *See* Ill. Admin. Code tit. 35 §§ 722.134(a)(4) and 725.116(b) and (c) [40 C.F.R. §§ 262.34(a)(4) and 265.16(b) and (c)]. A large quantity generator of hazardous waste must document that the training or job experience described above has been given to and completed by facility personnel. *See* Ill. Admin. Code tit. 35 §§ 722.134(a)(4) and 725.116(d) [40 C.F.R. §§ 262.34(a)(4) and 265.16(d)].



At the time of the inspection, the Tribune did not have records of hazardous waste training given to the following facility personnel: two facility personnel during calendar year 2013; three facility personnel during calendar year 2012; and one facility personnel during calendar year 2011.

By failing to comply with the conditions for a permit exemption, above, the Tribune became an operator of a hazardous waste storage facility, and was required to obtain an Illinois hazardous waste storage permit. The Tribune failed to apply for such a permit. The Tribune's failure to apply for and obtain a hazardous waste storage permit violated the requirements of Ill. Admin. Code tit. 35 §§ 703.121(a) and (b); 703.180(c); and 705.121(a) [40 C.F.R. §§ 270.1(c), and 270.10(a) and (d)]. Any failure to comply with a permit exemption condition incorporated from Ill. Admin. Code tit. 35 Part 725 [40 C.F.R. Part 265] is also an independent violation of the corresponding TSD requirement.

At this time, EPA is not requiring the Tribune to apply for an Illinois hazardous waste storage permit so long as it immediately establishes compliance with the conditions for a permit exemption outlined in paragraphs 1-2, above.

### **GENERATOR VIOLATIONS**

At the time of the inspection, the Tribune violated the following generator requirements:

#### **3. Recordkeeping**

Under Ill. Admin. Code tit. 35 § 722.140(a) [40 C.F.R. § 262.40(a)], a generator must keep a copy of each manifest with the signature from the owner or operator of the designated facility as a record for at least three years from the date the waste was accepted by the initial transporter.

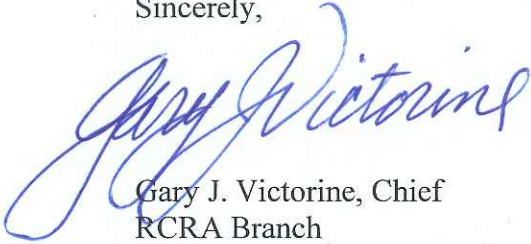
At the time of the inspection, the Tribune did not have records of signed copies from the owner or operator of the designated facility for three hazardous waste manifests.

During the inspection, as observed by EPA, and after the inspection, as documented in your July 17, 2014, July 18, 2014, July 29, 2014, August 5, 2014 and August 18, 2014 emails to EPA, you took certain actions to establish compliance with the permit exemption conditions in paragraphs 1-2, and the generator requirements in paragraph 3, above. Based on the information received from the Tribune on July 17, 2014, July 18, 2014, July 29, 2014, August 5, 2014 and August 18, 2014, EPA is not planning additional enforcement actions based on this inspection at this time. This letter does not limit the applicability of the requirements evaluated, or of other federal or state statutes or regulations. EPA appreciates the Tribune's cooperation.



If you have any questions regarding this letter, please contact Ms. Graciela Scambiaterra, of my staff, at 312-353-5103 or at [scambiaterra.graciela@epa.gov](mailto:scambiaterra.graciela@epa.gov).

Sincerely,



Gary J. Victorine, Chief  
RCRA Branch

Enclosure

cc: Todd Marvel, Illinois Environmental Protection Agency ([todd.marvel@illinois.gov](mailto:todd.marvel@illinois.gov))





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
LAND AND CHEMICALS DIVISION, RCRA BRANCH  
77 W. JACKSON BOULEVARD  
CHICAGO, IL 60604

COMPLIANCE EVALUATION INSPECTION REPORT

**INSTALLATION NAME:** Chicago Tribune – Freedom Center

**EPA ID No.:** ILD 045 304 367

**LOCATION ADDRESS:** 77 West Chicago Avenue  
Chicago, Illinois 60610

**NAICS CODE(s):** 51111 [Newspaper Publishers]

**DATE OF INSPECTION:** July 16, 2014


**U.S. EPA INSPECTOR(s):** Graciela Scambiaterra

**PREPARED BY:**

  
Graciela Scambiaterra  
Environmental Scientist

7/8/2015  
Date

**APPROVED BY:**

  
Michael Cunningham, Chief  
Compliance Section 1  
RCRA Branch  
Land and Chemicals Division

8/5/15  
Date



## **RCRA Compliance Evaluation Inspection**

### **Introduction**

I, Graciela Scambiatterra, Environmental Scientist, from the United States Environmental Protection Agency (EPA) conducted a hazardous waste compliance evaluation inspection (CEI) at Chicago Tribune (Tribune), located at 77 West Chicago Avenue, Chicago, Illinois. The Purpose of the CEI was to evaluate Tribune's compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA), specifically, those regulations related to the management and disposal of hazardous waste.

Photographs taken during the inspection are attached (*see* Attachment 1).  
Documents obtained during the inspection are annotated in Attachment 3.

### **History and Interview**

I arrived at Tribune on July 16, 2014 at approximately 9:15 a.m., and approached the visitor's entrance/guard station. I informed the guard on duty my purpose for being at the facility and asked to speak to the environmental coordinator, or anyone on staff that deals with the environmental duties at the Tribune. After several attempts, Lynne Allen and Henry Pulkowski met me at the visitor area. She escorted me to a conference room where I held an opening conference. Several other Tribune employees joined us in the conference area. The following individuals were present during the CEI:

<b>NAME</b>	<b>TITLE</b>	<b>EMPLOYER</b>
Gracie Scambiatterra	Environmental Scientist	U.S. EPA
Lynne Allen	Director of Facilities & Engineering	Chicago Tribune
Henry Pulkowski	Chief Engineer, H & A/C	Jones Lang LaSalle
<sup>1</sup> Tonya Powell	Safety Team Leader	Chicago Tribune
Terry Ford	Press Support Supervisor	Chicago Tribune
Marlon R. Medious	Unknown	Chicago Tribune

I provided Tonya Powell with the Small Business Resources Guide. During the opening conference, I explained to the Tribune representatives my purpose for being at the facility and what specific records I would need to review. I informed all of them that they should notify me immediately if any information and/or documents they were providing me were of Confidential Business Information (CBI). I explained to them that any CBI would be handled in accordance with EPA policy. At approximately 10:10 a.m., we moved into Ms. Powell's office and only Ms. Powell and Mr. Ford remained present for the remainder of the CEI. Ms. Powell informed me that she was new to her current position and was still getting up to speed on her new duties. She began her position as Safety Leader for the Tribune in April 2014.

---

<sup>1</sup> Ms. Powell asked for the CEI report and correspondence related to this visit to be sent to her attention.



Mr. Ford briefly explained the type of hazardous wastes that Tribune generates. Tribune generates a flammable blanket wash waste/waste print ink related material (D001). Blanket wash chemical (flammable) is mixed with water and used to clean the ink buildup from the press blankets. When the hazardous blanket wash waste becomes unusable, it's accumulated onsite and then sent offsite for disposal to Petro-Chem Processing Group in Detroit, Michigan. Petro-Chem Processing Group is a permitted Treatment, Storage and Disposal Facility (TSDF). Tribune also generate a non-hazardous waste ink from their printing process.

The Tribune purchased the facility on or about 1981. The Tribune originally notified EPA of its hazardous waste activities as a large quantity generator (LQG) on or about 1980 and has an NAICS code of 51111 [Newspaper Publishers]. The Tribune employs approximately 700 employees at this location and operates three shifts, 24/7.

The Tribune is has been operating as an LQG, however, they informed me that they have been aggressively working to minimize their waste.

After our opening discussion, approximately 10:40 a.m., I began the records review.

### Records Review

#### Annual Reports

Hazardous Waste Annual Report									
Calendar Year:		2013		Date Signed:		2/13/14			
Certified Mail Receipt: Unknown									
Waste Streams Reported									
D001 (3,320 gal)									
Transporters, and Treatment, Storage, and Disposal Facilities Used:									
Transporter						ILR000130062			
Transporter						IND984868406			
Transporter						ALD067138891			
TSDF						MID980615298			

Hazardous Waste Annual Report									
Calendar Year:		2012		Date Signed:		2/18/13			
Certified Mail Receipt: Unknown									
Waste Streams Reported									
D001 (3,190 gal)									
Transporters, and Treatment, Storage, and Disposal Facilities Used:									
Transporter						ILR000130062			
Transporter						IND984868406			
Transporter						ALD067138891			



Transporter	NJD986607380
TSDf	MID980615298

Hazardous Waste Annual Report							
Calendar Year:		2011		Date Signed:		Unknown	
Certified Mail Receipt: Unknown							
Waste Streams Reported							
D001 (2,420 gal)							
Transporters, and Treatment, Storage, and Disposal Facilities Used:							
Transporter				ILR000130062			
Transporter							
TSDf				MID980615298			

Manifests/LDRs

I reviewed the manifests and land disposal restriction (LDR) forms for years 2011 until the present time. I noted discrepancies for the following three hazardous waste manifests:

Hazardous Waste Manifests				
Manifest Number	Waste Code(s)	Quantity	Date	TSDf Signature
002288900GBF	D001	2 drums	12/4/2013	NO
002275786GBF	D001	3 drums	10/9/2013	NO
002271951GBF	D001	1 drum	9/24/2013	NO

In 2013, 2012 and 2011, all hazardous waste generated at the facility and manifested for offsite shipment was sent to MID980615298, Petro-Chem Processing Group in Detroit, Michigan.

During my review of the hazardous waste manifests, I also took note of the Tribune employees signing the manifests for offsite shipments each calendar year:

2014:

1. David Cates
2. Terry Ford
3. Tonya Powell (I was informed Ms. Powell began her position in April)
4. Harry Jones

2013:

1. Cathy Jackson
2. Taheisha Coleman
3. Terry Ford
4. James Smith
5. Gregory Cyphers
6. Harry Jones





2012:

1. Harry Jones
2. Robert Richards
3. Terry Ford
4. John Cousins
5. Linda Williams

Training

I asked Ms. Powell and Mr. Ford for the all the training records for employees undergoing hazardous waste management training (RCRA) in 2013, 2012 and 2011. I was provided with the following:

2013: training provided by Terry Ford

1. Harry Jones on 11/10/13.
2. James Smith on 11/10/13.
3. Greg Cyphers on 11/10/13.

2012: training provided by Terry Ford

1. Linda Williams on 3/1/2012.

2011: training provided by Terry Ford

1. John Cousins on 3/26/11.
2. Jon Healy on 4/21/11.
3. Joseph Weichinger on 3/26/11.
4. Lametra Elder on 3/31/11.
5. Terofilo Yu on 4/21/11.
6. Jesus Rodriguez on 4/21/11.
7. Esperanza Hernandez on 5/6/11.

I informed Ms. Powell and Mr. Ford that I had not been given training records to review for some Tribune employees that were directly involved in hazardous waste duties, specifically, signing hazardous waste manifests.

Contingency Plan

Ms. Powell provided the Contingency Plan for my review. The plan was originally prepared by Tribune staff and dated October 2010. The plan states that October 2010 is the most recent update. Ms. Powell and Mr. Ford informed me that the update had to do with general updates (contractor and operational changes, updated contact information, etc) and not because the Tribune had to implement the plan and it failed.

The plan I reviewed listed Frank Rocco as the Primary Emergency Coordinator, and Tom Bielke as the Secondary Emergency Coordinator.



An evacuation plan and map with routes, and an emergency response procedure for spills were included in the plan.

Additionally, the plan contained arrangements made with the Chicago police, fire, local hospital and emergency response contractor, as well as emergency response equipment and their location.

#### Universal Waste

I ask to review the waste documents for the facility's universal waste for the last three years. Ms. Powell and Mr. Ford informed me that they would need to provide them at a later date because they didn't know where they were being stored.

#### Hazardous Waste Determinations

I asked Ms. Powell and Mr. Ford for the hazardous waste determinations for the following waste streams:

1. Blanket Wash
2. Waste Ink

They could not locate them during the inspection. Ms. Powell informed me she would look for them and provide them to me at a later date.

#### Inspection Reports

I asked Mr. Ford for the last three years of inspection records for the less than 90-day accumulation area. I took note that the following individuals conducted the weekly inspections:

1. Terry Ford
2. Greg Cyphers

The checklist I reviewed included checking for: drum labeling, container leaks, closed containers, aisle space, eye wash station, and damaged containers.

I concluded the records review at 1:15 p.m. and prepared for the site inspection portion of the CEI.

#### Site Inspection

The Tribune site inspection began at 1:20 p.m. in the Floor Machine Shop on the 2<sup>nd</sup> floor. This area is where printing equipment is fixed and repaired. A parts washer machine is used in this area to clean the various printing equipment parts. A solvent from Crystal Clean is used in the parts washer and has a flashpoint over 140°F. The solvent waste from this machine is a non-hazardous waste.



The next area we inspected was the Press Room. Mr. Ford informed me that the Tribune had ten presses, of which eight were exactly the same. The two different presses were used to create the Wall Street Journal and the New York Times newspapers due to the color capacity needed for those two publications.

The ink used on the press machines is soy-based. We walked over to one of the blanket wash areas next to a press. Blanket wash solution is used to clean the ink buildup on the press blankets and other parts of the press equipment. Blanket wash rinses are placed in buckets and then used around a press area. Several buckets are used throughout the ten presses in the facility. When the bucket full of blanket wash solution becomes unusable, or too dirty with print ink, the blanket wash waste (also referred to as "waste print ink related material" is accumulated in 55-gallon drums in the less than 90-day hazardous waste storage area. Each unit also has a drip pad to capture the excess ink. The ink waste by itself is a non-hazardous waste.

Within the Press Room are five Quiet/Control Rooms (one for every two presses). We walked in the room between press numbers seven and eight. Mr. Ford explained that quality control occurs in these rooms (i.e. color and printing adjustments, etc). I observed two Tribune employees in this area looking over the quality of the product currently being produced from press number seven.

The next area we inspected was the Ink Cleanup Room. Here, the flammable blanket wash chemical gets mixed with water for each press area. Blanket wash chemical arrives at the Tribune in 330-gallon totes and is stored in this area until needed. When the blanket wash chemical gets mixed, it's placed in hand-held containers to be used in the press area (*see photo 1*). Buckets are used to capture the rinses and they are re-used several times on the press machines until the blanket wash rinses become a hazardous waste. Once this determination is made, the buckets of hazardous waste are taken to the less than 90-day storage area and placed in 55-gallon containers. The less than 90-day storage area was also located in this area. We walked over to the storage area and I observed three 55-gallon containers in the area (*see photo 2*). The container on the left was the only one containing hazardous blanket wash waste and was labeled with the words "waste print ink related material." I took a closer look at the Hazardous Waste label and noted that it did not have the accumulation start date written anywhere on the label. I checked the rest of the container and did not see the accumulation start date anywhere else on the container. I pointed this out to Mr. Ford and Ms. Powell.

We then walked through the Ink/Oil Storage area where most of the material that is needed for the press machines is stored. I did not observe any waste in this area.

The final area we inspected was the Ryco Room. Used oil, generated from the maintenance of the press machines, is brought to this area and stored in 330-gallon totes (*see photo 3*). At the time of the CEI, the Used Oil tote was approximately half full.



The Tribune site inspection ended at approximately 2:15 p.m., at which time we returned to the office area to conclude the CEI and hold a brief closing conference.

### Closing Conference

I held a closing conference with Ms. Powell and Mr. Ford in attendance. The following topics were discussed:

1. Training: we discussed the missing training records for Cathy Jackson and Taheisha Coleman during calendar year 2013; Harry Jones, Robert Richards, and John Cousins during calendar year 2012; and Terry Ford's training in 2011 or 2010 for being the Tribune's RCRA trainer in 2011, 2012 and 2013.
2. Waste determinations: we discussed the missing waste determinations for the blanket wash waste and the waste ink waste.
3. Universal Waste documents: we discussed the missing universal waste documents for the Tribune's offsite universal waste shipments between 2011 through 2013.
4. Hazardous Waste: we discussed the missing accumulation start date on the 55-gallon container of hazardous blanket wash waste/waste print ink related material.
5. Hazardous waste manifests: we discussed the three hazardous waste manifested shipments that were missing the copy of the final signature from the TSDF that the waste had been accepted for treatment and/or disposal.

Ms. Powell and Mr. Ford informed me that they would provide me a written update as soon as possible (via email or fax) concerning all the five topics discussed above.

I completed the CEI and departed the facility at approximately 3:15 p.m.

### **ATTACHMENTS: (3)**

Attachment 1	Photograph taken during the inspection
Attachment 2	Inspection checklist
Attachment 3	List of documents obtained during the CEI







Photo 1. Photographer: G. Scambiatterra. Time: 1:51 p.m.  
Description: Blanket wash mix to be used to clean the press blankets full of ink.



# Attachment 1

Chicago Tribune- Freedom Center

RCRA ID: ILD 045 304 367

July 16, 2014



Photo 2. Photographer: G. Scambiaterra. Time: 1:53 p.m.

Description: Blanket wash waste/waste print ink related material (left container). Container did not have an accumulation start date. Right containers are non-hazardous waste.



**Attachment 1**

Chicago Tribune- Freedom Center

RCRA ID: ILD 045 304 367

July 16, 2014



Photo 3. Photographer: G. Scambiaterra. Time: 2:00 p.m.  
Description: Used oil tote – half full.



Installation Name:  
Chicago Tribune-Freedom Center

Date of Inspection:  
July 16, 2014

Location Address:  
77 West Chicago Avenue

U.S. EPA Inspector:  
Graciela Scambiaterra

EPA ID Number:  
ILD 045 304 367

**Attachment 2**

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	<b>PART 722: STANDARDS APPLICABLE TO GENERATORS OF HAZARDOUS WASTE (&gt;1000 KG/MO.)</b>	
	<b>SUBPART A: GENERAL</b>	
722.111	<b>Section 722.111 Hazardous Waste Determination</b> Has the generator correctly determined if the solid waste(s) it generates is a hazardous waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Have hazardous wastes been identified for purposes of compliance with Part 728? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.111
808.121(a)	Has the generator correctly determined if the solid waste(s) it generates is a special waste? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
722.112(a)	<b>Section 722.112 USEPA Identification Numbers</b> Has the generator obtained a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	808.121(a) 722.112(a)
722.112(c)	Has the generator offered its hazardous waste only to transporters or to treatment, storage or disposal facilities that have a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.112(c)
	<b>SUBPART B: THE MANIFEST</b>	
722.120(a)	<b>Section 722.120 General Requirements</b> Does the facility manifest its waste off-site? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
722.120(b)	Does the manifest designate a facility permitted to handle the waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.120(a)
722.120(d)	Has the generator shipped any waste that could not be delivered to the designated facility? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.120(b)
722.121(a)	<b>Section 722.121 Acquisition of Manifests</b> Has the generator used: - an Illinois manifest for wastes designated to a facility within Illinois? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.120(d) 722.121(a)
722.121(b)	- a manifest from the State to which the manifest is designated? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - an Illinois manifest if the State to which the waste is designated has no manifest of its own? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.121(b)
722.122	<b>Section 722.122 Number of Copies</b> Does the manifest consist of at least 6 copies? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.122
722.123(a)	<b>Section 722.123 Use of the Manifest</b> For each manifest reviewed, has the generator: - signed the certificate by hand? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - obtained the handwritten signature and the date of acceptance by the initial transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - retained one copy as required by Section 722.140(a)? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> - apparently sent a copy (part 5 for the Illinois manifest) to the Agency within 2 working days? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.123(a)
722.123(b)	- has the generator apparently given the remaining copies to the transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.123(b)





**Installation Name:**  
Chicago Tribune-Freedom Center  
**Date of Inspection:**  
July 16, 2014

**Location Address:**  
77 West Chicago Avenue  
**U.S. EPA Inspector:**  
Graciela Scambiaterra

**EPA ID Number:**  
ILD 045 304 367

**Attachment 2**

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
722.123(c)	- has the generator followed the procedures prescribed in Section 722.123 for manifesting bulk shipments of hazardous waste by rail or water? Yes _____ No _____ N/A _____	722.123(c)
722.130	<b>SUBPART C: PRE-TRANSPORT REQUIREMENTS</b> Is there any hazardous waste ready for transport off-site? <input checked="" type="checkbox"/> Yes _____ No _____ N/A _____ If so, is the generator complying with the pre-transport requirements in Subpart C? Yes _____ No _____ N/A _____	722.130
(722.134(a))	<b>Section 722.134 Accumulation Time</b> Has the generator complied with the following requirements: Yes _____ No <input checked="" type="checkbox"/> N/A _____	
(722.134(a)(1))	A) For waste in containers, has the generator complied with the requirements of Part 725, Subpart I, AA, BB, and CC? Yes <input checked="" type="checkbox"/> No _____ N/A _____ and/or B) For waste in tanks, has the generator complied with the requirements of Part 725, Subpart J, AA, BB, and CC (except Sections 725.297(c) and 725.300)? Yes _____ No _____ N/A <input checked="" type="checkbox"/> and/or C) For waste on drip pads, has the generator complied with the requirements of Part 725, Subpart W and maintained the required records identified in this subsection? Yes _____ No _____ N/A <input checked="" type="checkbox"/> and/or D) For waste in containment buildings, has the generator complied with Part 725, Subpart DD and maintained the required records identified in this subsection? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	
(722.134(a)(2))	For waste in containers, has the generator marked and made visible for inspection on each container, the date upon which accumulation began? Yes _____ No <input checked="" type="checkbox"/> N/A _____	
(722.134(a)(3))	For waste in containers and tanks, has the generator marked or labeled each with the words "Hazardous Waste"? Yes <input checked="" type="checkbox"/> No _____ N/A _____	
(722.134(a)(4))	Has the generator complied with the requirements of Part 725, Subparts C and D, and Sections 725.116 and 728.107(a)(4)? Yes _____ No <input checked="" type="checkbox"/> N/A _____ Specifically, the requirements of items 1 and/or 4 above (listed by regulation) which need to be complied with are as follows: Does the facility accumulate hazardous waste in containers? <input checked="" type="checkbox"/> Yes _____ No _____ N/A _____ If "No", go to Subpart J.	
(725.211) (725.214)	<b>SUBPART I: USE AND MANAGEMENT OF CONTAINERS</b> Has the generator closed an accumulation area? Yes _____ No _____ N/A <input checked="" type="checkbox"/> If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214? Yes _____ No _____ N/A _____	725.211 725.214



Installation Name:  
Chicago Tribune-Freedom Center  
Date of Inspection:  
July 16, 2014

Location Address:  
77 West Chicago Avenue  
U.S. EPA Inspector:  
Graciela Scambiaterra

EPA ID Number:  
ILD 045 304 367

**Attachment 2**

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.271)	<p>If the containers have leaked or are in poor condition, has the owner/operator transferred the hazardous waste to a suitable container?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	
(725.272)	<p>Is the waste compatible with the container and/or liner?</p> <p>Yes <input checked="" type="checkbox"/> No _____ N/A _____</p>	
(725.273(a))	<p>Are containers of hazardous waste always closed except to remove or add waste during accumulation?</p> <p>Yes <input checked="" type="checkbox"/> No _____ N/A _____</p>	
(725.273(b))	<p>Are containers of hazardous waste being opened, handled, or stored in a manner which will prevent the rupture of the container or prevent it from leaking?</p> <p>Yes <input checked="" type="checkbox"/> No _____ N/A _____</p>	
(725.274)	<p>Is the owner/operator inspecting the accumulation area(s) at least weekly, looking for leaks or deterioration?</p> <p>Yes <input checked="" type="checkbox"/> No _____ N/A _____</p> <p>Is the accumulation area free from any evidence of leaking or deteriorating containers? (See also Section 725.131)</p> <p>Yes <input checked="" type="checkbox"/> No _____ N/A _____</p>	
(725.276)	<p>Are containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from the facility's property line?</p> <p>Yes <input checked="" type="checkbox"/> No _____ N/A _____</p> <p><b>Note:</b> See Section 725.117(a) for additional requirements for ignitable, reactive or incompatible wastes.</p>	
(725.277)	<p>Is the owner/operator complying with the requirements concerning incompatible wastes?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>COMMENTS:</p>	
(725.278)	<p><b>Section 725.278 Air Emission Standards</b></p> <p>Is the owner or operator managing all hazardous waste placed in containers in accordance with Subparts AA, BB and CC of Part 725?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>Comments:</p> <p>Does the generator accumulate and/or treat hazardous waste in tanks?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p><b>Note:</b> If "No", go to Subpart C.</p>	
	<p><b>SUBPART J: TANK SYSTEMS</b></p> <p>Has the generator closed an accumulation area?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	
(725.211)		725.211
(725.214)		725.214



Installation Name:  
Chicago Tribune-Freedom Center

Date of Inspection:  
July 16, 2014

Location Address:  
77 West Chicago Avenue

U.S. EPA Inspector:  
Graciela Scambiaterra

EPA ID Number:  
ILD 045 304 367

**Attachment 2**

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.290)	<p>Does the facility accumulate or treat hazardous waste in tanks? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p><b>Note:</b> A generator may treat hazardous waste in a tank for less than 90 days without a RCRA permit. If "No", skip Subpart J.</p> <p>a) Tank systems that are used to accumulate or treat hazardous waste which contains no free liquids (using the Paint Filter Liquids Test) and that are situated inside a building with an impermeable floor are exempted from the requirements in Section 725.293.</p> <p>b) Tank systems, including sumps, that serve as part of a secondary containment system to collect or contain releases of hazardous wastes are exempted from the requirements in Section 725.293(a).</p> <p>c) Tanks, sumps and other collection devices used in conjunction with drip pads (as defined in Section 720.110) and regulated under Subpart W, must meet the requirements of this Subpart.</p>	
(725.291(a))	<p>For tanks <b>existing</b> prior to July 14, 1986 (see definition of tank system under 720.110) and not protected by a secondary containment system, has a written assessment been reviewed and certified by an IRPE(*) in accordance with Section 702.126(d) by January 12, 1988 [except as provided in Section 725.291(c)]? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	
(725.291(b))	<p>Does this assessment consider at least the following:</p> <p>1) design standards for the tank and ancillary equipment? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>2) hazardous characteristics of the wastes? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>3) existing corrosion protection measures? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>4) documented age of the tank system? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>5) results of a leak test, internal inspection, or other tank integrity examination? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>*IRPE = Independent Registered Professional Engineer</p>	
(725.291(c))	<p>Has a tank system assessment been performed within 12 months after the materials in the tank become a hazardous waste? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p><b>Note:</b> If an assessment indicates a tank system is leaking or unfit for use, the owner/operator must comply with the requirements of Section 725.291(b)(5).</p>	



Installation Name:  
Chicago Tribune-Freedom Center  
Date of Inspection:  
July 16, 2014

Location Address:  
77 West Chicago Avenue  
U.S. EPA Inspector:  
Graciela Scambiaterra

EPA ID Number:  
ILD 045 304 367

## Attachment 2

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.292(a))	<p>For new tanks (see definition of new tanks under Section 720.110) whose installation commenced after 07/14/86, has a written assessment been reviewed and certified by an IRPE in accordance with Section 702.126(d) prior to operation of the tank system?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>Does the assessment include, at a minimum, the following:</p> <p>1) design standards for tanks and ancillary equipment?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>2) hazardous characteristics of the waste(s) to be handled?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>3) evaluation of potential for corrosion and corrosion protection measures for tank systems with metal components in contact with soil or water?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>4) design or operational measures that will protect underground tank systems from potential damage resulting from vehicular traffic?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>5) designs to ensure adequate foundations, anchoring to prevent flotation or dislodgment and the ability to withstand the effects of frost heave?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	
(725.292(g))	<p>Has the owner/operator obtained and kept on file at the facility the written statements, including the certification statements [as required in Section 702.126(d)] of the design and installation requirements of Subsections (b) through (f)?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	
(725.293(a))	<p>Is secondary containment provided for any new tank system before being put into service?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>Does an existing tank, used to accumulate F020, F021, F022, F023, F026 or F027 waste(s), have secondary containment by 1/12/89?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>For an existing tank of documentable age, is secondary containment provided by 1/12/89 or when the tank is 15 years old, whichever is later?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>For an existing tank of undocumentable age, has secondary containment been provided by 1/12/95?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>or</p> <p>if the facility is older than 7 years, by the time the facility reaches 15 years of age or 1/12/89, whichever is later?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>For tanks that accumulate wastes that become hazardous after 1/12/87, has secondary containment been provided within the time intervals required in Subsections (a)(1) through (a)(4) substituting the date that a material becomes a hazardous waste for 1/12/87?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	
(725.293(b))	<p>Is the secondary containment system designed, installed and operated to prevent migration of wastes or accumulated liquid out of the system at any time?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>Is the secondary containment system capable of detecting and collecting releases and accumulated liquids until the collected material is removed?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	





Installation Name:  
Chicago Tribune-Freedom Center  
Date of Inspection:  
July 16, 2014

Location Address:  
77 West Chicago Avenue  
U.S. EPA Inspector:  
Graciela Scambiatterra

EPA ID Number:  
ILD 045 304 367

**Attachment 2**

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.293(c))	<p>To meet the requirements of Subsection (b), is the secondary containment system:</p> <p>1) compatible with the waste(s) in the tank and of sufficient strength and thickness to prevent failure? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>2) placed on a foundation or base capable of providing support, providing resistance to pressure gradients and preventing failure due to settlement, compression of uplift? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>3) provided with a leak detection system designed and operated to detect any release or accumulated liquid within 24 hours? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>4) sloped or otherwise designed or operated to drain and remove liquids resulting from leaks, spills or precipitation? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>and is spilled or leaked waste and accumulated precipitation removed from the secondary containment within 24 hours? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p><b>Note:</b> A RCRA permit may allow for removal of liquids less frequently than 24 hours after accumulation.</p>	
(725.293(d))	<p>Does the secondary containment for tanks have one or more of the following:</p> <p>1) a liner (external to the tank); or 2) a vault; or 3) a double-walled tank; or 4) an equivalent device (approved by the Board)? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	
(725.293(e))	<p>Does the external liner system(s), vault system(s) and/or double-walled tank(s) meet the additional requirements identified in Section 725.293(e)? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	
(725.293(f))	<p>Is ancillary equipment protected by secondary containment that meets the requirement of Subsection (h) and (c)? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>If "No":</p> <p>1) Is aboveground piping (exclusive of flanges, joints, valves and connections) inspected daily? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>2) Are welded flanges, joints and connections inspected daily? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>3) Are sealless or magnetic coupling pumps and sealless valves inspected daily? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>4) Are pressurized aboveground piping systems with automatic shut-off devices inspected daily? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	
(725.293(i))	<p>Until such time as secondary containment is provided, are the following requirements being met for all tank systems:</p> <p>1) For non-enterable underground tanks, has an annual leak test that meets the requirements of 725.291(b)(5) been conducted? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>2) For other than non-enterable underground tanks and ancillary equipment, has an annual leak test, internal inspection or other tank integrity examination by an IRPE been conducted? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>3) Are written records maintained at the facility to document the assessments required under Subsections (i)(1) and (i)(2)? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p><b>Note:</b> If a tank system is found to be leaking or unfit for use as a result of a leak test or assessment, the owner/operator must comply with Section 725.296.</p>	



**Installation Name:**  
Chicago Tribune-Freedom Center  
**Date of Inspection:**  
July 16, 2014

**Location Address:**  
77 West Chicago Avenue  
**U.S. EPA Inspector:**  
Graciela Scambiaterra

**EPA ID Number:**  
ILD 045 304 367

**Attachment 2**

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.294(a))	Has the owner/operator placed hazardous wastes or treatment reagents in the tank system that could cause the system to rupture, leak, corrode or otherwise fail? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	
(725.294(b))	Do tanks and secondary containment have appropriate controls and practices to prevent spills and overflows including: 1) spill prevention controls? Yes _____ No _____ N/A <input checked="" type="checkbox"/> 2) overflow prevention controls? Yes _____ No _____ N/A <input checked="" type="checkbox"/> 3) sufficient freeboard in uncovered tanks? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	
(725.294(c))	<b>Note:</b> If a leak or spill has occurred in the tank system, the owner/operator shall comply with the requirements of Section 725.296.	
(725.295(a))	Does the owner/operator inspect, if present, at least each operating day, the following: 1) overflow/spill control equipment? Yes _____ No _____ N/A <input checked="" type="checkbox"/> 2) the aboveground portion of the tank system for corrosion or releases? Yes _____ No _____ N/A <input checked="" type="checkbox"/> 3) data from monitoring equipment? Yes _____ No _____ N/A <input checked="" type="checkbox"/> 4) the construction materials and the area immediately surrounding the external portion of the system? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	
(725.295(b))	If the tank system has cathodic protection, is the owner/operator complying with Section 725.295(b) to ensure that they are functioning properly? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	
(725.295(c))	Does the owner/operator document in the operating record, the results of tank inspections as required in Section 725.295(a) and (b)? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	
(725.296)	If the tank system or secondary containment system has a leak or spill or is unfit for use, has the owner/operator: a) immediately ceased using; prevented flow or addition of waste and inspected the system to determine the cause of the release? Yes _____ No _____ N/A <input checked="" type="checkbox"/> b) removed applicable waste from the system within 24 hours of detection? Yes _____ No _____ N/A <input checked="" type="checkbox"/> c) immediately conducted a visual inspection of the release and taken actions to contain visible releases to the environment, prevented further migration to soils or surface water and removed and properly disposed of any contaminated soil or water? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	
(725.296(d))	d) notified the Agency within 24 hours of detection of release? Yes _____ No _____ N/A <input checked="" type="checkbox"/> d)3) within 30 days of detection of release, submitted a report to the Agency that complies with the requirements of Section 725.296(d)(3)? Yes _____ No _____ N/A <input checked="" type="checkbox"/> <b>Note:</b> Notification and reports are not necessary if less than 1 pound of material is spilled and it was immediately contained and cleaned up.	



Installation Name:  
Chicago Tribune-Freedom Center  
Date of Inspection:  
July 16, 2014

Location Address:  
77 West Chicago Avenue  
U.S. EPA Inspector:  
Graciela Scambiatterra

EPA ID Number:  
ILD 045 304 367

**Attachment 2**

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.296(e))	<p>e) repaired the tank system prior to returning the tank system to service in the event that a leak has occurred from the primary tank system into the secondary containment system? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>e)4) provided secondary containment before returning a tank system to service in the event that the release was from a component of a tank system without secondary containment? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>e)4) met the requirements for a new tank system in the event that a component is replaced during repair? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>e)4) provided the entire component with secondary containment prior to being returned to use in the event that a leak has occurred in any portion of a component that is not readily accessible for visual inspection? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	
(725.296(f))	<p>f) In the event that an extensive repair has been conducted in accordance with subsection (e), submitted to the Agency within 7 days after returning the tank system to use, a certification by an IRPE stating that the repaired system is capable of handling hazardous wastes without release for the intended life of the system? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p><b>Note:</b> If the owner/operator does not satisfy the requirements of subsections (e)(2) through (e)(4), the tank system must be closed in accordance with Section 725.297.</p>	
(725.297(a))	<p>At the time of closure of a tank system, has the owner/operator removed or decontaminated all waste residues, contaminated components, contaminated soils and structures and equipment and managed them as hazardous waste [unless Section 721.103(d) applies]? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	
(725.297(a))	<p>Have the closure plan, closure activities, cost estimates for closure and financial responsibility for tank systems met all requirements specified in Subparts G and H? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	
(725.297(b))	<p>If the tank system cannot be "clean" closed, has the owner/operator closed the tank system and performed post-closure care in accordance with the closure and post-closure care requirements that apply to landfills (Section 725.410)? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p><b>Note:</b> Such a tank system is considered a landfill and must meet all of the requirements of landfills specified in Subparts G and H.</p>	
(725.298(a))	<p>Are ignitable or reactive wastes placed in a tank system? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>If "No", skip to Section 725.299.</p> <p>Is the waste treated, rendered or mixed before or immediately after placement in the tank system so that:</p> <ul style="list-style-type: none"> <li>- the resulting waste, mixture or dissolved material is no longer ignitable or reactive? Yes _____ No _____ N/A <input checked="" type="checkbox"/></li> <li>- Section 725.117(b) is complied with? Yes _____ No _____ N/A <input checked="" type="checkbox"/></li> </ul> <p>or</p> <p>Is the waste accumulated or treated so that it is protected from any material or conditions which may lead to ignition or reaction? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>or</p> <p>Is the tank used solely for emergencies? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	



Installation Name:  
Chicago Tribune-Freedom Center  
Date of Inspection:  
July 16, 2014

Location Address:  
77 West Chicago Avenue  
U.S. EPA Inspector:  
Graciela Scambiatterra

EPA ID Number:  
ILD 045 304 367

**Attachment 2**

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.298(b))	Is the facility complying with the requirements regarding maintenance of protective distances between the waste management area and any public ways, streets, alleys or any adjoining property line? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	
(725.299)	Are incompatible wastes/materials placed in the same tank? Yes _____ No _____ N/A <input checked="" type="checkbox"/>  If "No", skip to Section 725.300.  Is Section 725.117(b) being complied with? Yes _____ No _____ N/A <input checked="" type="checkbox"/>  Has the tank system been properly decontaminated if it previously held an incompatible waste/material unless Section 725.117(b) is complied with? Yes _____ No _____ N/A <input checked="" type="checkbox"/>  COMMENTS:	
(725.302)	<b>Section 725.302 Air Emission Standards</b> Is the owner or operator managing all hazardous waste placed in tanks in accordance with Subparts AA, BB and CC of Part 725? Yes _____ No _____ N/A <input checked="" type="checkbox"/>  Comments:	
(725.131)	<b>SUBPART C: PREPAREDNESS AND PREVENTION</b>  Is the facility being operated and maintained to minimize the possibility of a fire, explosion or any release of hazardous waste or hazardous waste constituents which could threaten human health or the environment? Yes <input checked="" type="checkbox"/> No _____ N/A _____	
(725.132)	Is the facility equipped with the following, if necessary: a) an internal communication or alarm system(s)? Yes <input checked="" type="checkbox"/> No _____ N/A _____ b) a telephone or other device to summon emergency assistance from local authorities? Yes <input checked="" type="checkbox"/> No _____ N/A _____ c) portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? Yes <input checked="" type="checkbox"/> No _____ N/A _____ d) water at adequate volume and pressure for fire control? Yes <input checked="" type="checkbox"/> No _____ N/A _____	
(725.133)	Is the facility testing and maintaining communication/alarm system(s), fire protection equipment, spill control equipment and decontamination equipment? Yes <input checked="" type="checkbox"/> No _____ N/A _____	
(725.134)	a) Where hazardous waste is being handled, do all employees have immediate access to an internal alarm or other emergency communication device? Yes <input checked="" type="checkbox"/> No _____ N/A _____ b) If there is ever just one employee on the premises when the facility is operating, does he/she have immediate access to a device capable of summoning external emergency assistance? Yes <input checked="" type="checkbox"/> No _____ N/A _____	
(725.135)	Is the facility maintaining adequate aisle space? Yes <input checked="" type="checkbox"/> No _____ N/A _____	





Installation Name:  
Chicago Tribune-Freedom Center  
Date of Inspection:  
July 16, 2014

Location Address:  
77 West Chicago Avenue  
U.S. EPA Inspector:  
Graciela Scambiaterra

EPA ID Number:  
ILD 045 304 367

**Attachment 2**

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.137)	<p>Has the facility attempted to make the following arrangements, as appropriate, for the type of facility and waste:</p> <ul style="list-style-type: none"> <li>- arrangements with local emergency authorities (i.e. police and fire departments, other emergency response agencies) to familiarize them with the layout of the facility, properties of hazardous waste handled, places where facility personnel would be working, entrances to roads inside the facility and evacuation routes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- agreements designating the primary authority where more than one police or fire department might respond? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- agreements with State emergency response teams, contractors and equipment suppliers? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the type of injuries or illnesses which could result from fires, explosions or releases at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> </ul>	
(725.151(a))	<p><b>SUBPART D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES</b></p> <p>Is the contingency plan available? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>If "No", skip to Section 725.155.</p> <p>Is the plan designed to protect human health and the environment from releases to the air, soil and water? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.151(b))	<p>Has there been a fire, explosion or release of hazardous waste? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p> <p>If "Yes", has the contingency plan been carried out immediately? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.152(a))	<p>Does the plan describe the actions required for response to:</p> <ul style="list-style-type: none"> <li>- fires? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- explosions? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- releases? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> </ul>	
(725.152(c))	<p>Does the plan describe arrangements with:</p> <ul style="list-style-type: none"> <li>- police and fire departments? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- hospitals? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- contractors? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- emergency response teams? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> </ul>	
(725.152(d))	<p>Does the plan contain the current emergency coordinator's name, phone (office and home) and address? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.152(e))	<p>Does the plan identify all emergency equipment including:</p> <ul style="list-style-type: none"> <li>- description? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- capability? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- location? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> </ul> <p>Is the list of emergency equipment up-to-date? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.152(f))	<p>Does the plan include:</p> <ul style="list-style-type: none"> <li>- an evacuation plan? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- an evacuation signal? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- alternate evacuation routes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> </ul>	



**Installation Name:**  
Chicago Tribune-Freedom Center  
**Date of Inspection:**  
July 16, 2014

**Location Address:**  
77 West Chicago Avenue  
**U.S. EPA Inspector:**  
Graciela Scambiaterra

**EPA ID Number:**  
ILD 045 304 367

**Attachment 2**

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.153)	<p>Has the contingency plan (including all revisions) been:</p> <p>a) maintained at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>b) submitted to:</p> <p>- police department? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>- fire department? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>- hospital? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>- emergency response teams? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.154)	<p>Has the contingency plan been reviewed and revised whenever:</p> <p>a) regulations are revised? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>b) the plan fails in an emergency? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>c) the facility changes in a way that modifies the emergency response necessary? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>d) information regarding emergency coordinators changes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>e) information regarding equipment changes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.155)	<p>Is the emergency coordinator on-site or on call at all times? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Is the emergency coordinator familiar with all facility activities, wastes, records, layout and contingency plan? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Does the emergency coordinator have the authority to commit the resources needed to carry out the actions specified in the contingency plan? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.156)	<p>If the facility has had a release, fire or explosion, have the procedures of this Section been followed regarding assessment, response and reporting? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p><b>Note:</b> If the facility has had a release, explain in detail.</p>	



Installation Name:  
Chicago Tribune-Freedom Center  
Date of Inspection:  
July 16, 2014

Location Address:  
77 West Chicago Avenue  
U.S. EPA Inspector:  
Graciela Scambiaterra

EPA ID Number:  
ILD 045 304 367

## Attachment 2

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.116(a))	<p><b>Section 725.116 Personnel Training</b> Does the facility have a training program? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Have facility personnel successfully completed a program of classroom or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of Part 725? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Is the program directed by a person trained in hazardous waste management procedures? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Does the program teach facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Does the program cover, at a minimum:</p> <ul style="list-style-type: none"> <li>- procedures to familiarize facility personnel with emergency procedures, emergency equipment and emergency systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- key parameters for automatic waste feed cut-off systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- communications or alarm systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- response to fire or explosions? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- response to groundwater contamination incidents? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- shutdown of operations? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> </ul>	
(725.116(b))	<p>Have new employees completed the program within 6 months of the date of employment or assignment to a position requiring them to manage hazardous waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.116(c))	<p>Have facility personnel received an annual review of the initial training? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.116(d))	<p>Are the following documents and records being maintained at the facility:</p> <ol style="list-style-type: none"> <li>1) the job title for each position related to hazardous waste management and the name(s) of the employee(s) filling each job? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>2) a written job description for each position above, including the requisite skill, education or other qualifications and duties of personnel assigned to each position? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>3) a written description of the type and amount of both initial and continuing training that will be given to each person filling a position dealing with hazardous waste management? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>4) records documenting that the training or job experience has been given to and completed by facility personnel? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></li> </ol>	
(725.116(e))	<p>Is the facility maintaining training records until closure of the facility and those of former employees for at least 3 years from the last date of employment? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p>	









Installation Name:  
Chicago Tribune-Freedom Center  
Date of Inspection:  
July 16, 2014

Location Address:  
77 West Chicago Avenue  
U.S. EPA Inspector:  
Graciela Scambiaterra

EPA ID Number:  
ILD 045 304 367

**Attachment 2**

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
722.141(a)	<b>Section 722.141 Annual Reporting</b> Has the generator who ships hazardous waste off-site for treatment, storage or disposal filed an annual report with the Agency by March 1 for the preceding calendar year? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	<b>Note:</b> If "No", or if deficiencies are noted with the annual report reviewed, contact the Planning and Reporting Section.	722.141(a)
722.141(b)	Has the generator who treats, stores or disposes of hazardous waste on-site, filed an annual report with the Agency by March 1 for the preceding calendar year? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
		722.141(b)
722.142(a)(1)	<b>Section 722.142 Exception Reporting</b> If the generator has not received a copy of the manifest from the TSD facility within 35 days of the date of delivery to the transporter, has the generator contacted the transporter or the TSD facility to determine the status of the hazardous waste? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
		722.142(a)(1)
722.142(a)(2)	If the generator has not received a copy of the signed manifest within 45 days of the date of delivery to the transporter, has he filed an exception report with the Agency in accordance with the requirements of this Section? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
		722.142(a)(2)
722.143	<b>Section 722.143 Additional Reporting</b> Has the generator furnished additional reports as required by the Director? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
		722.143
722.150	<b>SUBPART E: EXPORTS OF HAZARDOUS WASTE</b> Is the generator an exporter of hazardous waste? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> If "Yes", has the generator complied with the requirements of Subpart E? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
		722.150
722.160	<b>SUBPART F: IMPORTS OF HAZARDOUS WASTE</b> Is the generator an importer of hazardous waste? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> If "Yes", has the generator complied with the requirements of Subpart F? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
		722.160
722.170	<b>SUBPART G: FARMERS</b> Is the generator a farmer? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> If "Yes", has the generator complied with the requirements of Subpart G? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.170



### Attachment 3

Chicago Tribune- Freedom Center

RCRA ID: ILD 045 304 367

July 16, 2014

Documents received during the inspection:

Document #	Description	Claimed as CBI
1	Hazardous and non-hazardous waste tracking documents for years 2011 - 2014 (7 pages)	No

